REMARKS/ARGUMENTS

This Amendment is being filed in response to a final Official Action on a Request for Continued Examination (RCE). The final Official Action of this RCE rejects Claims 1, 4-6, 8, 9, 10, 13-15, 17-19, 22-28 and 32-36 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,377,810 to Geiger et al., in view of U.S. Patent No. 7,240,015 to Karmouch et al. The Official Action then rejects Claims 3, 12, 20 and 30 under 35 U.S.C. § 103(a) as being unpatentable over Geiger in view of Karmouch, and further in view of U.S. Patent No. 6,377,810 to Ganesh; rejects Claims 4, 6, 8, 9, 13, 15, 17, 18, 21 and 31 as being unpatentable over Geiger in view of Karmouch, and further in view of U.S. Patent Application Publication No. 2004/0064707 to McCann et al.; and rejects Claims 7 and 16 as being unpatentable over Geiger in view of Karmouch, and further in view of U.S. Patent Application Publication No. 2002/0083183 to Pujare et al.

Initially, Applicant notes that the Official Action rejects Claims 4, 6, 8, 9, 13, 15, 17 and 18 as being unpatentable over Geiger, in view of Karmouch; and as being unpatentable over Geiger in view of Karmouch, and further in view of U.S. Patent Application Publication No. 2004/0064707 to McCann. In this regard, Applicant notes that although the Official Action indicates that Claims 4, 6, 8, 9, 13, 15, 17 and 18 are rejected over Geiger and Karmouch, and without McCann, the Official Action does not provide any substantive analysis of those claims without McCann. Instead, the Official Action substantively addresses those claims with the additional application of McCann to the combination of Geiger and Karmouch. As confirmed by the Examiner by return voicemail to Applicants' undersigned attorney on August 5, 2008, the Official Action erroneously indicates the rejection of those claims over Geiger and Karmouch (without McCann), and that those claims are in fact being rejected over the combination of all three of Geiger, Karmouch and McCann. Thus, as also confirmed by the Examiner, the Official Action only intended to reject Claims 1, 5, 10, 14, 19, 22-28 and 32-36 as being unpatentable over Geiger, in view of Karmouch.

The foregoing notwithstanding, as explained below, Applicant respectfully submits that the claimed invention is patentably distinct from Geiger, Karmouch, Ganesh, McCann and Pujare, taken individually or in any proper combination. In view of the remarks presented

herein, Applicant respectfully requests reconsideration and allowance of all of the pending claims of the present application. Alternatively, as the remarks presented herein do not raise any new issues or introduce any new matter, Applicant respectfully requests entry of this Amendment for purposes of narrowing the issues upon appeal.

A. Claims 1, 5, 10, 14, 19, 22-28 and 32-36 are Patentable

The final Official Action rejects (or more precisely, Applicant presumes the Official Action intended to reject) Claims 1, 5, 10, 14, 19, 22-28 and 32-36 as being unpatentable over Geiger, in view of Karmouch. According to one aspect of the claimed invention, as reflected by independent Claim 10, a system for controlling access to an event includes first and second network entities, and an event server maintaining an event. The first network entity is configured to control access to event-based information available within a network and associated with the event. In this regard, the first network entity is configured to receive, from the second network entity, a request to access event-based information, where the second network entity may be unknown to the first network entity prior to the first network entity receiving the request.

The first network entity is configured to receive consent to access the event-based information associated with the event, automatically create an authorization in response to receiving the consent, and thereafter transmit the authorization. The second network entity is configured to receive the authorization, and thereafter transmit a subscription message. The subscription message includes the authorization and an event package describing the event-based information. Finally, the event server is configured to receive the subscription message, and thereafter determine whether to accept the subscription message based upon the authorization.

As explained in response to the first Official Action, in contrast to independent Claim 10, Geiger does not teach or suggest controlling access to an event whereby the entity controlling access to event-based information (first network entity) receives a request to access that information from another entity (second network entity) unknown to the first network entity prior to receiving the request. Geiger may disclose a mobile device granting a requesting entity to receive location information for that device, but Geiger does not teach or suggest that the

requesting entity is unknown to the mobile device before the mobile device receives a request for its location information. In this regard, Geiger discloses that its mobile device and requesting entity are preferably members of the same security domain.

The Official Action now concedes Geiger does not teach or suggest the aforementioned feature, but nonetheless alleges that Karmouch discloses the feature and that it would have been obvious to one skilled in the art to combine Geiger and Karmouch to teach the system of independent Claim 10. Applicant respectfully disagrees, however, and submits that like Geiger, Karmouch also does not teach or suggest the aforementioned feature. That is, neither Geiger nor Karmouch, taken individually or in any proper combination, teaches or suggests a system for controlling access to an event whereby the entity controlling access to event-based information (first network entity) receives a request to access that information from another entity (second network entity) unknown to the first network entity prior to receiving the request, as recited by independent Claim 10.

Briefly, Karmouch discloses an architecture of multiple agents for setting up and enforcing policies within each site of a virtual network. As disclosed, a policy server receives obligation and authorization policies from agents, manages the status of the policies, and ensures that new policies do not conflict with existing policies. *See* Karmouch, FIG. 1; and col. 4 lines 41-44, 51-55 (explaining that a first layer and policy server contain user profiles, access policies; and that the policy server contains private knowledge base for each site). The policy server distributes the obligation policies to the agents responsible to perform actions specified therein, and distributes the authorization policies to an authorization server that grants agents authorization to perform a set of actions. In this regard, a requester agent required to perform an action sends a request for an authorization to the authorization server, which processes the request and, if the request is authorized, delivers a ticket to the requester agent. The requester agent then sends the ticket to an agent executor, which verifies the ticket and, if the ticket is verified, executes the action.

As disclosed by Karmouch, then, an authorization server receives a request to perform an action from a requester agent, and determines the authorization of the requester agent to perform the action based on an authorization policy. As also disclosed by Karmouch, each authorization

policy defines a relationship between a requester agent and an action, and includes a subject specifying the agent to which the authorization applies. Karmouch, col. 6, l. 35 – col. 7, l. 2. As the authorization server receives authorization policies that specify the requester agents to which the policies apply, and as these policies are necessary for the authorization server to authorize a requester agent to a requested action, the requester agent is in fact known to authorization server of Karmouch (similar to that of Geiger) prior to the request from the requester agent. Independent Claim 10, on the other hand, recites that the requesting entity (second network entity) is unknown to the entity controlling access to event-based information (first network entity) prior to the request being received by the entity controlling access. Thus, similar to the known relationship of Geiger, Karmouch also requires a relationship (between requestor agent and policy server etc. of the visited site).

Applicant therefore respectfully submits that independent Claim 10, and by dependency Claims 12-18, 23, 26 and 34, is patentably distinct from Geiger and Karmouch, taken individually or in any proper combination. Applicant also respectfully submits that independent Claims 1, 19 and 28 recite subject matter similar to that of independent Claim 10, including the aforementioned consent and automatic authorization-creation features with receipt of a request from a network entity unknown prior to the request. As such, Applicant also respectfully submits that independent Claims 1, 19 and 28, and by dependency Claims 3-9, 20-22, 24, 25, 27, 30-33, 35 and 36, are also patentably distinct from Geiger and Karmouch, taken individually or in any proper combination, for at least the reasons given above.

For at least the foregoing reasons, Applicant respectfully submits that the rejection of Claims 1, 5, 10, 14, 19, 22-28 and 32-36 as being unpatentable over Geiger, in view of Karmouch is overcome.

B. Claims 3, 12, 20 and 30 are Patentable

The Official Action rejects Claims 3, 12, 20 and 30 as being unpatentable over Geiger in view of Karmouch, and further in view of Ganesh. As explained above, independent Claims 1, 10, 19 and 28, and by dependency Claims 3-9, 12-18, 20-27 and 30-36, are patentably distinct from Geiger and Karmouch, taken individually or in any proper combination. Applicant

respectfully submits that Ganesh does not cure the deficiencies of Geiger and Karmouch. That is, even considering Ganesh, none of Geiger, Karmouch or Ganesh, taken individually or in any proper combination, teaches or suggests the aforementioned controlling access to an event whereby the entity controlling access to event-based information (first network entity) receives a request to access that information from another entity (second network entity) unknown to the first network entity prior to receiving the request, as per independent Claims 1, 10, 19 and 28. In this regard, Ganesh requires the pre-authorization of requesting entity. *See* Ganesh, FIG. 2, step 52. This is a first verification in that if the user cannot login, the user cannot even reach a second verification in which the authorization of the user is verified. *See id.*, FIG. 2, step 82; and col. 2, lines 38-41. Applicants therefore respectfully submit that independent Claims 1, 10, 19 and 28, and by dependency Claims 3-9, 12-18, 20-27 and 30-36, are patentably distinct from Geiger, Karmouch and Ganesh, taken individually or in any proper combination. For at least the foregoing reasons, Applicants submit that the rejection of Claims 3, 12, 20 and 30 as being unpatentable over Geiger in view of Karmouch, and further in view of Ganesh is overcome.

C. Claims 4, 6, 8, 9, 13, 15, 17, 18, 21 and 31 are Patentable

The Official Action rejects Claims 4, 6, 8, 9, 13, 15, 17, 18, 21 and 31 as being unpatentable over Geiger in view of Karmouch, and further in view of McCann. As explained above, independent Claims 1, 10, 19 and 28, and by dependency Claims 3-9, 12-18, 20-27 and 30-36, are patentably distinct from Geiger and Karmouch, taken individually or in any proper combination. Applicant respectfully submits that McCann does not cure the deficiencies of Geiger and Karmouch. That is, even considering McCann, none of Geiger, Karmouch or McCann, taken individually or in any proper combination, teach or suggest the aforementioned controlling access to an event whereby the entity controlling access to event-based information (first network entity) receives a request to access that information from another entity (second network entity) unknown to the first network entity prior to receiving the request, as per independent Claims 1, 10, 19 and 28. Applicants therefore respectfully submit that independent Claims 1, 10, 19 and 28, and by dependency Claims 3-9, 12-18, 20-27 and 30-36, are patentably distinct from Geiger, Karmouch and McCann, taken individually or in any proper combination.

For at least the foregoing reasons, Applicants submit that the rejection of Claims 4, 6, 8, 9, 13, 15, 17, 18, 21 and 31 as being unpatentable over Geiger in view of Karmouch, and further in view of McCann is overcome.

D. Claims 7 and 16 are Patentable

The Official Action rejects Claims 7 and 16 as being unpatentable over Geiger in view of Karmouch, and further in view of Pujare. As explained above, independent Claims 1, 10, 19 and 28, and by dependency Claims 3-9, 12-18, 20-27 and 30-36, are patentably distinct from Geiger and Karmouch, taken individually or in any proper combination. Applicant respectfully submits that Pujare does not cure the deficiencies of Geiger and Karmouch. That is, even considering Pujare, none of Geiger, Karmouch or Pujare, taken individually or in any proper combination, teach or suggest the aforementioned controlling access to an event whereby the entity controlling access to event-based information (first network entity) receives a request to access that information from another entity (second network entity) unknown to the first network entity prior to receiving the request, as per independent Claims 1, 10, 19 and 28. Applicants therefore respectfully submit that independent Claims 1, 10, 19 and 28, and by dependency Claims 3-9, 12-18, 20-27 and 30-36, are patentably distinct from Geiger, Karmouch and Pujare, taken individually or in any proper combination.

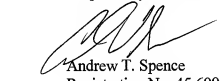
For at least the foregoing reasons, Applicants submit that the rejection of Claims 7 and 16 as being unpatentable over Geiger in view of Karmouch, and further in view of Pujare is overcome.

CONCLUSION

In view of the remarks presented above, Applicant respectfully submits that the present application is in condition for allowance. As such, the issuance of a Notice of Allowance is therefore respectfully requested. In order to expedite the examination of the present application, the Examiner is encouraged to contact Applicant's undersigned attorney in order to resolve any remaining issues. As explained above, no new matter or issues are raised by this Reply, and as such, Applicant alternatively respectfully requests entry of this Reply for purposes of narrowing the issues upon appeal.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



Andrew T. Spence
Registration No. 45,699

Customer No. 00826
ALSTON & BIRD LLP
Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
Tel Charlotte Office (704) 444-1000
Fax Charlotte Office (704) 444-1111
LEGAL02/30901294v1

ELECTRONICALLY FILED USING THE EFS-WEB ELECTRONIC FILING SYSTEM OF THE UNITED STATES PATENT & TRADEMARK OFFICE ON OCTOBER 16, 2008.